

STATE OF WASHINGTON



OFFICE OF  
INSURANCE COMMISSIONER

*In the Matter of*

**The Market Conduct Examination  
of Minnesota Life Insurance  
Company.**

)  
) No. G 2000 - 09  
)  
) AMENDED FINDINGS,  
CONCLUSIONS,  
) AND ORDER ADOPTING REPORT  
)

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**BACKGROUND**

An examination of the market conduct of Minnesota Life Insurance Company (the Company) for the period January 1, 1992, to December 31, 1996, was conducted by market conduct examiners of the Washington State Office of the Insurance Commissioner. The Company is an insurer authorized under RCW 48.05.030. This examination was conducted in compliance with the laws and regulations of the State of Washington and in accordance with the procedures promulgated by the National Association of Insurance Commissioners and the Office of the Insurance Commissioner. This examination was limited to Marketing, Advertising, Agents, Complaints, Replacements, Policies, and Disciplinary Actions.

The examination report with the findings and recommendations was transmitted to the Company for their comments on December 6, 1999. Response to the draft report was received on January 19, 2000.

The Commissioner or a designee has considered the report, the relevant portions of the examiner workpapers, and the submission by the Company. The report was modified to reflect new information provided by the company in their response to the draft report.

Subject to the right of the Company to demand a hearing pursuant to chapters 48.04 and 34.05 RCW, the Commissioner adopts the following findings, conclusions, and order.

### **FINDINGS**

The Commissioner adopts as findings the findings of the examiners as contained in the report.

### **CONCLUSIONS**

It is appropriate and in accordance with law to adopt the attached examination report as the final report of the market conduct of the Company.

### **ORDER**

The examination report as filed, attached hereto and incorporated by reference, is hereby **ADOPTED** as the final examination report and replaces any order previously entered in this matter.

It is **ORDERED** that the Company comply with the Instructions in the Report as follows (the page and other references are to the report):

1. The Company is in violation of WAC 284-23-060(1) and is instructed to make certain that its full name and home office address are clearly identified on all advertisements. (Page 8).
2. The Company is in violation of RCW 48.17.060 and is instructed to make certain all agents are licensed with the State of Washington prior to soliciting applications on behalf of the company. (Page 13).
3. The Company is in violation of RCW 48.17.010 and is instructed to make certain all agents are appointed by the company with the State of Washington prior to soliciting applications on behalf of the Company. (Page 13)
4. The Company is in violation of Washington Replacement Regulations, WAC 284-23-400 through WAC 284-23-485. They are instructed to change procedures to comply with all sections of the Washington Replacement Regulations.

ENTERED at Lacey, Washington, this 24<sup>th</sup> day of February, 2000.

DEBORAH SENN

Insurance Commissioner

By:

WILLIAM E. FRANSEN

Deputy Commissioner

